

The Honorable Kymberly K. Evanson

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STEVEN FLOYD, JOLENE FURDEK, and
JONATHAN RYAN, on behalf of themselves
and all others similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware
corporation, and APPLE INC., a California
corporation,

Defendants.

Case No. 2:22-cv-01599-KKE

**STIPULATED MOTION AND ORDER
REGARDING SEALING OF CLASS
CERTIFICATION BRIEFING**

The Parties have met and conferred with respect to the upcoming briefing on class certification, and anticipate that their briefs, declarations, exhibits, and expert reports will quote from and/or describe in detail a significant amount of information that has been designated as Confidential or Highly Confidential-Attorneys' Eyes Only by either a Party or Non-Party. Accordingly, in order to ensure that such materials are treated appropriately under the applicable protective order, and to reduce burdens on the Court, the Parties, and Non-Parties, pursuant to LCR 7(d)(1) and 10(g), the Parties and their respective counsel hereby stipulate and agree to the following procedure for filing and sealing in connection with the class certification briefing, subject to the Court's approval.

1. Pursuant to LCR 5(g)(2), each Party will provisionally file under seal its class certification briefs (including any opening, response, and reply briefs), expert declarations or reports, exhibits, and all other evidence and declarations on which that Party relies (collectively, "Class Certification Papers") which contain material designated Confidential or Highly Confidential-Attorneys' Eyes Only by any Party or Non-Party.

2. Within four weeks of filing, pursuant to LCR 5(g), the Parties, and any necessary Non-Parties, will meet and confer and, as appropriate, file (1) public versions of their Class Certification Papers, with necessary redactions, and (2) corresponding motion(s) to seal pursuant to LCR 5(g)(3). The schedule for filing any such public versions of the Parties' Class Certification Papers and corresponding motion(s) to seal shall be as follows:

FILING	DATE
Motion for class certification and supporting expert reports	May 14, 2025
Filing of public versions of class certification papers and corresponding motion(s) to seal	June 11, 2025
Opposition to motion for class certification and supporting expert reports	August 14, 2025

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RE SEALING OF CLASS CERT. BRIEFING - 1

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FILING	DATE
Filing of public versions of opposition to class certification and corresponding motion(s) to seal	September 11, 2025
Reply in support of motion for class certification and reply expert reports	November 14, 2025
Filing of public versions of class certification papers and corresponding motion(s) to seal	December 12, 2025

3. The Party or Non-Party seeking to maintain material under seal (or under redaction) shall be the movant for purposes of any such motion(s) to seal associated with the Parties' class certification briefing.

IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.

DATED: May 5, 2025

Respectfully submitted,

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ORDER

The Court GRANTS the parties' stipulated motion. Dkt. No. 215.

Dated this 7th day of May, 2025.



Kymberly K. Evanson
United States District Judge